

COHENMILSTEIN



GibbsLawGroup^{LLP}

June 1, 2023

VIA ECF

The Honorable Vincent L. Briccetti
United States District Court Judge
for the Southern District of New York
300 Quarropas Street, Room 630
White Plains, NY 10601

Re: Roberts et al. v. International Business Machines Corp., 7:21-CV-09928

Dear Judge Briccetti:

I write on behalf of all Plaintiffs in the above-referenced matter to request an extension to file their amended complaint.

The current deadline for Plaintiffs to file their amended complaint is today, June 1, 2023. The parties have been engaged in discussions regarding whether some of the remaining claims should be voluntarily dismissed, and additional information regarding this topic was provided by IBM to Plaintiffs today. Plaintiffs therefore request a brief extension of two weeks, until June 15, 2023, to allow the parties to complete these discussions. Plaintiffs have made one previous request to extend their time to file an amended complaint. Defendants have consented to the extension requested herein, which does not affect any other case deadlines.

If this proposed extension meets with Your Honor's approval, a "So Ordered" line is provided below for the Court's convenience.

Respectfully submitted,

/s/ Ashleigh A. Musser
Ashleigh A. Musser

cc: Matt W. Lampe
Kristina A. Yost

Attorneys for Defendant

IT IS SO ORDERED.

DATED: _____

Hon. Vincent L. Briccetti
United States District Court Judge